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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,

Plaintiff.

v.

Civil Action No. 05-3350 (MLC)

QUALCOMM INCORPORATED,

Defendant.

**QUALCOMM INCORPORATED'S AMENDED AND SUPPLEMENTAL
INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)**

EXHIBIT 3 PAGE 167

Defendant QUALCOMM Incorporated ("Qualcomm") hereby submits the following amended initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. The following amended and supplemental initial disclosures are intended to supersede Qualcomm Incorporated's Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, dated October 28, 2005. Qualcomm has not fully completed its investigation into its claims and/or defenses herein and makes these disclosures based solely on information reasonably available to it to date and reserves the right to amend or further supplement these disclosures. Qualcomm makes these disclosures subject to, and without waiver of, any attorney-client, work product or other applicable privileges or immunities.

A.i. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

The following individuals may have discoverable information, relating to the bracketed subjects, that Qualcomm may use to support its defenses herein.

Qualcomm provides each individual's current position:¹

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 [Qualcomm's licensing discussions with Broadcom; Qualcomm licensing practices and policies; Licensing practices of wireless communications and video technology industry participants]

¹ All persons whose names are underlined are current or former employees of Qualcomm. All communications with those individuals should be made only through Qualcomm counsel.

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A.ii. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

The following categories of documents, copies of which are located in the files of the persons listed in Section A above or in general Qualcomm files, may be used by Qualcomm to support its defenses in this action:

- Documents regarding the licensing practices of wireless communications technology industry participants
- Documents regarding the IPR disclosure practices of participants in standards development organizations
- Documents regarding practices and conduct of participants in standards development organizations
- Documents regarding competition in digital video technology
- Documents regarding the licensing practices of participants in the digital video technology industry
- Documents regarding proposals to standards development organizations, and the consideration thereof by standards development organizations and their respective members or participants
- Documents regarding the relative merits of different technologies or specifications that were considered by standards development organizations
- Documents regarding the relative merits of various vendors' wireless application-specific integrated circuits

These documents are likely to be located at Qualcomm's San Diego campus and at its offices at 9 Damon Mill Square - Suite 2A, Concord, MA 01742-2864.

As Qualcomm has previously advised plaintiff, some of the documents requested by plaintiff exist in an electronic form. Some of the documents that Qualcomm may use to support its claims or defenses exist in an electronic form, but Qualcomm does not currently expect to use them in that form to support its claims or defenses.

- A.iii. A computation of any category of damages claimed by the disclosing party who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

None known at this time.

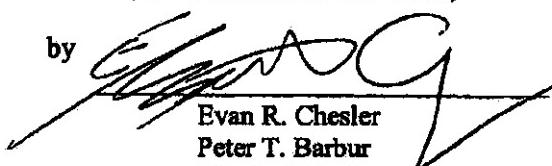
- A.iv. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

No such agreements exist.

December 21, 2007

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